

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Unit 491 – HF Alkylation Unit  
Unit 6191 – Light Ends Recovery Unit  
Alliance Refinery  
ConocoPhillips Company  
Belle Chasse, Plaquemines Parish, Louisiana  
Agency Interest Number: 2418  
Activity Number: PER20080007  
Draft Permit No. 2512-V2**

**I. APPLICANT:**

**Company:**

ConocoPhillips Company  
P.O. Box 176, Belle Chasse, LA 70037

**Facility:**

Alliance Refinery  
15551 Hwy 23, Belle Chasse, Plaquemines Parish, Louisiana  
Approximate UTM coordinates are 211.51 kilometers East and 3,286.84 kilometers North, Zone 16

**II. FACILITY AND CURRENT PERMIT STATUS:**

ConocoPhillips Company owns and operates the Alliance Refinery, a petroleum refinery located in Belle Chasse, Louisiana. Gulf Oil Company built the refinery in 1970. BP Oil Company owned Alliance Refinery from 1985 until Tosco Corporation (Tosco) purchased it in September 2000. Tosco later became a wholly owned subsidiary of Phillips Petroleum Company on September 17, 2001. On August 30, 2002, Phillips Petroleum Company, including its subsidiary Tosco Corporation, completed a merger with Conoco Inc. to form ConocoPhillips Company. On January 1, 2003, the owner and operator of the Alliance Refinery formally changed from Tosco to ConocoPhillips Company.

Alliance Refinery produces a wide range of petroleum products from crude oil, such as motor gasoline, jet fuel, diesel fuel, LPG, carbon black feedstock, propane, and coke. It

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also produces by-product elemental sulfur and petrochemicals such as benzene, toluene, and xylene. The plant is covered by Standard Industrial Classification (SIC) 2911.

Unit 491 – HF Alkylation Unit

Unit 491 – HF Alkylation Unit (AU) converts olefins produced in Unit 1291 – Fluidized Catalytic Cracking Unit (FCCU) into a gasoline boiling range material (alkylate) used in gasoline blending. The unit produces the following products: propane, alkylate, butane (also used in gasoline blending), and acid soluble oil (ASO). Processing sections of the unit are the reaction section, acid/hydrocarbon separation section, acid cooling section, hydrocarbon fractionation section, deisobotanizer section and hydroisomerization section.

FCCU olefins stream is hydroisomerized, improving it as a feedstock for the alkylation reaction. In the reaction section, the hydroisomerized FCCY olefins stream, mixed butanes from Unit 7991 – Saturated Gas Unit (SGU), and purchased isobutene are combined with a large recycled isobutene stream and mixed with Hydrofluoric (HF) acid. HF acid is then separated from the hydrocarbon phase and cooled. The hydrocarbon phase is separated into products listed above and a recycle isobutane stream. A deisobutanizer section recovers isobutene from the AU reactor overheads and butane from the SGU. The unit's two process heaters burn only refinery fuel gas.

Unit 6191 – Light Ends Recovery Unit

The Light Ends Recovery Unit (LERU) consists of a series of separators, compressors, dehydrators, chillers, exchangers, and fractionation columns that receive the cracked gas stream from Unit 1291 – Fluidized Catalytic Cracking Unit. The stream is separated into two gas streams: an ethane/ethylene stream and a propane/propylene stream. The ethane/ethylene stream is routed to the refinery fuel gas system. The propane/propylene olefins stream is sent to the Alkylation Unit.

The Light Ends Recovery Unit has no emission point sources. The only source of air emissions in the LERU is fugitive VOC losses from the piping connections, pumps, and valves.

Several Part 70 and PSD permits addressing portions of the facility have already been issued. These include:

Permit Number	Units or Sources	Unit Name	Date Issued
PSD-LA-75(M-2)	Unit 301	Boilers	10/13/87
PSD-LA-624	Source 301-B-3	Supplemental Boiler	09/16/98
2593-V1	Unit 293	Gulfining Unit	04/11/07

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Permit Number	Units or Sources	Unit Name	Date Issued
2113-V1	Unit 292	Diesel Hydrotreater Unit	09/10/07
2513-V4	Unit 412	Offsites	12/07/05
2776-V1	Unit 7591	Merox Treater Unit	01/03/08
2511-V2	Unit 891	Delayed Coking Unit	11/16/05
2840-V1	Unit 294	Low Sulfur Gasoline Unit	08/03/07
PSD-LA-696	Unit 294	Low Sulfur Gasoline Unit	10/03/03
2512-V1	Unit 491 & Unit 6191	HF Alkylation & Light Ends Recovery Unit	10/08/03
2778-V0	Unit 303	Utilities	08/16/04
2774-V2	Unit 591/592	Sulfur Recovery Unit	09/04/07
1810-V2 AA	Unit 1291/301	Fluidized Catalytic Cracking Unit/CO Boilers	01/30/07
1870-V0	Unit 308W	Wastewater Treatment Unit	08/23/05
2313-V1	Unit 406	Marine Loading and Transfer Operations	02/28/08
2180-V0	Unit 191/7991	Crude and Saturate Gas Unit	04/25/06
2779-V1	Unit 308F	Flares Unit	09/04/07
2775-V1	Units 291/1391/1791/1792	Naphfining, Catalytic Reforming, Aromatic Extraction, and Thermal Hydrodealkylation Units	10/01/08

### III. PROPOSED PERMIT / PROJECT INFORMATION:

#### Permit Application Submittal Information

ConocoPhillips Company submitted an application and Emission Inventory Questionnaire (EIQ) dated March 28, 2008, as well as additional information dated November 26, 2008, January 8, 2009, and January 27, 2009, requesting a Part 70 permit renewal/modification.

#### Project description

ConocoPhillips is not proposing any physical modifications with this renewal application.

ConocoPhillips is proposing the following changes:

1. Add 40 CFR 60 Subpart J requirements to the Alkylation Isostripper Reboiler, Emission Point No. 491-H-1, and Alkylation Depropanizer Reboiler, Emission Point No. 491-H-2, as required by the Consent Decree (Civil Action H-05-0258 lodged January 27, 2005). The requirements were added by Administrative Amendment issued September 16, 2005.

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2. Add the following Insignificant Activities:
  - Sodium Chloride Tank, Emission Point No. 491-T-NaCl
  - Sodium Hypochlorite Tank, Emission Point No. 491-T-NaOCl
3. Reconcile fugitive emissions with updated emission factors and component counts.
4. Reconcile reboiler emissions based on new API emission factors.
5. Add Hydrogen Chloride Tank, Emission Point No. 491-T-HCL, since this tank does not qualify as an insignificant activity.
6. Renew the Part 70 Operating Permit.

**Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	37.83	37.83	-
SO <sub>2</sub>	39.82	39.82	-
NO <sub>x</sub>	294.36	294.36	-
CO	0.10	0.10	-
VOC *	167.82	131.32	-36.50
Lead	-	0.005	+0.005

**\*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs) in TPY:**

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
1,3-Butadiene	0.30	0.220	-0.080
2,2,4-Trimethylpentane	10.88	8.310	-2.570
Acetaldehyde	-	0.018	+0.018
Acrolein	-	0.025	+0.025
Benzene	1.55	1.298	-0.252

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**\*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs) in TPY:**

Pollutant	Before	After	Change
Biphenyl	0.01	0.010	-
Cresols	0.01	0.010	-
Cumene	0.04	0.040	-
Ethylbenzene	0.24	0.254	+0.014
Formaldehyde	-	0.077	+0.077
n-Hexane	0.74	0.580	-0.160
Naphthalene	0.02	0.020	-
Phenol	-	0.006	+0.006
PAH	-	<0.001	-
Toluene	1.86	1.693	-0.167
Xylenes (mixed isomers)	1.69	1.377	-0.313
Total TAPs	17.34	13.938	-3.402
Other VOCs	150.48	117.382	-33.098

**\*NON-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After	Change
Antimony	-	<0.001	-
Arsenic	-	0.001	+0.001
Barium	-	0.009	+0.009
Beryllium	-	<0.001	-
Cadmium	-	0.002	+0.002
Chromium VI	-	0.009	+0.009
Copper	-	0.007	+0.007
Hydrochloric Acid	-	0.386	+0.386
Manganese	-	0.007	+0.007
Mercury	-	<0.001	-
Nickel	-	0.011	+0.011
Selenium	-	0.002	+0.002
Sulfuric Acid	0.49	0.490	-

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Zinc	-	0.079	+0.079
Total	0.49	1.003	+0.513

### **Prevention of Significant Deterioration Applicability**

Since there are no physical modifications with this application, a Prevention of Significant Deterioration analysis is not required.

This application was reviewed for compliance with the Part 70 operating permit program. It was also reviewed for compliance with Louisiana Air Quality Regulations, National Emission Standards for Hazardous Air Pollutants (NESHAP), and New Source Performance Standards (NSPS). Prevention of Significant Deterioration (PSD) does not apply.

### **MACT requirements**

Compliance with the Louisiana Fugitive Emission Consolidation Program, with LA Refinery MACT being the most stringent program for Unit 491 – HF Alkylation Unit and Unit 6191 Light Ends Recovery Unit, is determined as MACT for fugitive emissions. Compliance with MACT for the Alkylation Unit Cooling Tower is achieved since the chromium based corrosion inhibitor has been replaced.

### **Air Modeling Analysis**

Dispersion Model(s) Used: ISCST3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard (NAAQS)
NO <sub>x</sub>	Annual	20.56 µg/m <sup>3</sup>	(100 µg/m <sup>3</sup> )
	3-hour	458.30 µg/m <sup>3</sup>	(1300 µg/m <sup>3</sup> )
SO <sub>2</sub>	24-hour	264.25 µg/m <sup>3</sup>	(365 µg/m <sup>3</sup> )
	Annual	25.31 µg/m <sup>3</sup>	( 80 µg/m <sup>3</sup> )

The dispersion model was run for the Clean Fuels project. The screening model results for SO<sub>2</sub> were added to the Clean Fuels results since the 2005 flare study resulted in a significant increase of SO<sub>2</sub> emission estimates.

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Impact on air quality from Unit 491/6191 will be below the National Ambient Air Quality Standards (NAAQS) and the Louisiana Ambient Air Standards (AAS) beyond industrial property.

**General Condition XVII Activities**

The facility will comply with the applicable requirements of General Condition XVII of the Louisiana Air Emission Permit General Conditions in the Title V Permit. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit. These releases are small and will have an insignificant impact on air quality.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

**IV. Permit Shields**

A permit shield was not requested.

**V. Periodic Monitoring**

Fugitive emissions must be monitored according to the provisions of Louisiana Refinery MACT.

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## VI. Applicability and Exemptions of Selected Subject Items

Regulatory applicability, standards, monitoring, reporting and recordkeeping requirements are provided in the Facility Specific Requirements Section of the draft permit. The table below summarizes highlights of the regulatory applicability for each emission point.

Source ID No.:	Requirement	Applicability
Facility – Unit 491/Unit 6191	40 CFR 61.340 Subpart FF– National Emission Standard for Benzene Waste Operations.	Refinery has > 10 Mg/yr benzene from waste and must meet control, reporting, and recordkeeping requirements. (See Title V Permit, Unit 308W, Wastewater Treatment Unit.)
491-H-1 and 491-H-2 Alkylation Iso stripper and Alkylation Depropanizer Reboilers	LAC 33:III.1101.B – Control of Emissions of Smoke	Emissions of smoke shall be controlled so shade is not darker than 20 % opacity. Particulate matter source shall be controlled so that the shade or appearance of emissions is not denser than 20 % average opacity, except for >20% for not more than one 6 min. period in any 60 consecutive min.
	LAC 33:III.1313.C – Emission Standards for Particulate Matter	Limit the quantity of particulate matter emitted from fuel burning equipment to <0.6 lb/MMBTU of heat input.
	LAC 33:III.1503.C – Emission Standard for Sulfur Dioxide	EXEMPT. Unit emits <250 tpy SO <sub>2</sub> .
	40 CFR 60 Subpart J – Standards of Performance for Petroleum Refineries	Hydrogen Sulfide concentration in fuel gas must be less than 0.10 gr/dscf. (The Alkylation Iso stripper Reboiler and Alkylation Depropanizer Reboiler shall comply with provisions of 40 CFR 60 Subpart J as required by the Consent Decree (Civil Action H-05-0258 lodged January 27, 2005))
491-FF 6191-FF 491 Unit Fugitives 6191 Unit Fugitives	LAC 33:III.2111 Control of Emissions of Organic Compounds – Pumps and Compressors	All rotary pumps and compressors handling VOC with TVP >= 1.5 psia to be equipped with mechanical seals or equivalent approved equipment.
	LAC 33:III.5109.A Comprehensive Toxic Air Pollutant Emission Control Program	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Compliance with the Louisiana Fugitive Emission Consolidation Program, with LA Refinery MACT, being the most stringent program, is determined as MACT.

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## VII. Streamlined Requirements

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Unit 491 – HF Alkylation Unit	LAC 33:III.Chapter 51, LA MACT for Refineries  40 CFR 63, Subpart CC NESHAP – Petroleum Refineries  40 CFR 60 Subpart GGG NSPS – VOC Equipment Leaks in Petroleum Refineries  LAC 33:III.2121, Louisiana Fugitive Emission Control	$\geq 5\%$ VOTAP (Class I + II)  $\geq 5\%$ organic HAP  $\geq 10\%$ VOC  $\geq 10\%$ VOC	LA MACT for Refineries
Unit 6191 – Light Ends Recovery Units	LAC 33:III.Chapter 51, LA MACT for Refineries  40 CFR 60 Subpart GGG NSPS – VOC Equipment Leaks in Petroleum Refineries  LAC 33:III.2121, Louisiana Fugitive Emission Control	$\geq 5\%$ VOTAP (Class I + II)  $\geq 10\%$ VOC  $\geq 10\%$ VOC	LA MACT for Refineries

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## VIII. Glossary

**Best Available Control Technologies (BACT)** - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

**CAM** - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

**Carbon Black** - A black colloidal substance consisting wholly or principally of amorphous carbon and used to make pigments and ink.

**Carbon Monoxide (CO)** – (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.

**Cooling Tower** – A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

**Continuous Emission Monitoring System (CEMS)** – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

**Cyclone** – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

**Duct Burner** – A device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

**Federally Enforceable Specific Condition** - A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;

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- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

**Grandfathered Status-** Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

**Heat Recovery Steam Generator (HRSG)** – A steam generator that recovers exhaust heat from a gas turbine, and provides economizing and steam generation surfaces.

**Hydrogen Sulfide (H<sub>2</sub>S)** - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

**Maximum Achievable Control Technology (MACT)** - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

**NESHAP** - National Emission Standards for Hazardous Air Pollutants –Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

**Nitrogen Oxides (NO<sub>x</sub>)** - Compounds whose molecules consists of nitrogen and oxygen.

**Nonattainment New Source Review (NNSR)** - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

**NSPS** - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

**Organic Compound** - Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

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**Part 70 Operating Permit**- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

**PM<sub>10</sub>**- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

**Potential to Emit (PTE)** - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

**Prevention of Significant Deterioration (PSD)** – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

**Selective Catalytic Reduction (SCR)** – A noncombustion control technology that destroys NO<sub>x</sub> by injecting a reducing agent (e.g., ammonia) into the flue gas that, in the presence of a catalyst (e.g., vanadium, titanium, or zeolite), converts NO<sub>x</sub> into molecular nitrogen and water.

**Sulfur Dioxide (SO<sub>2</sub>)** – An oxide of sulfur.

**TAP** - Toxic Air Pollutant (LDEQ acronym for air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3).

**Title V permit** – See Part 70 Operating Permit.

**“Top Down” approach** – An approach which requires use of the most stringent control technology found to be technically feasible and appropriate based on environmental, energy, economic, and cost impacts.

**Turbine** – A rotary engine in which the kinetic energy of a moving fluid is converted into mechanical energy by causing a bladed rotor to rotate.

**Volatile Organic Compound (VOC)** - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.